

COMMENTS OF GEORGE L. BARBER
ON BEHALF OF THE
EAST SAN JOAQUIN PARTIES
RELATIVE TO THE NOTICE OF PREPARATION OF
THE EAST BAY MUNICIPAL UTILITY DISTRICT
FOR THE FOLSOM ENVIRONMENTAL IMPACT REPORT

FEBRUARY 13, 1996
LODI, CALIFORNIA

I am George Barber. I am a member of the San Joaquin County Board of Supervisor; however, these comments are made on behalf of the Policy Committee of the East San Joaquin Parties of which I am the Chair. The East San Joaquin Parties consist of the North San Joaquin Water Conservation District, the City of Lodi, the Woodbridge Irrigation District, the Stockton East Water District, the City of Stockton, the Central San Joaquin Water Conservation District, and the County of San Joaquin.

As you know, the East San Joaquin Parties have for some time been working with the East Bay Municipal Utility exploring and, we hope in the future implementing, a joint conjunctive use project utilizing the groundwater basin underlying the East San Joaquin Parties for the mutual benefit of East Bay and San Joaquin County. As you also know, we jointly have undertaken with East Bay a study which was commenced in May of 1995. The final report of the study entitled "Mokelumne Aquifer Recharge and Storage Project" is nearing completion by Montgomery Watson Americas, Inc., in association with CH2M Hill. The final report will be dated January 1996.

Within this report, seven different project alternatives were evaluated. Each alternative (I through IV, V, V(a), and V(b)) contemplates a different combination of water conveyance facilities including different routing for a Folsom South Canal facility to Lower Farmington Canal conveyance facility. Page 18 of the Report's executive summary gives the following breakdown of which alternatives contemplate which conveyance facilities:

UNLINED FLAT CANAL (FOLSOM SOUTH CANAL TO LOWER FARMINGTON CANAL) Alternatives I, II, V, and V(a)

UNLINED FLAT CANAL (MOKELUMNE RIVER TO LOWER FARMINGTON CANAL) Alternatives III, IV, and V(b)

SACRAMENTO RIVER DIVERSION PIPELINE
Alternative II

BEAVER SLOUGH DIVERSION PIPELINE
Alternative IV

FOLSOM SOUTH CANAL PIPELINE
Alternatives III, and V(b)

The specific concern of the East San Joaquin Parties is with alternate locations for the conveyance facility you contemplate. Your Notice of Preparation indicates the possibility of alternative locations for the contemplated conveyance facility, but the facility described in the Notice of Preparation is a

pipeline extending from the contract East Bay turnout to the Central California Traction Line and then along that route to the East Bay Aqueducts.

As has been know to the East Bay staff working on the joint studies, the East San Joaquin Parties have consistently favored a conveyance facility extending south from the end of the Folsom South Canal along the original route of the Canal. The East San Joaquin Parties have also favored an unlined canal or alternatively a pipeline along the same route. If necessary, a facility could commence at the East Bay turnout and parallel the existing Canal and then extend along the original route south of the existing Canal. The reason for preferring a canal and a route along the original Folsom South Canal route is to maximize the usefulness of the facility in a joint conjunctive use project. All this is set forth in the "Mokelumne Aquifer Recharge and Storage Project" report.

In view of the serious consideration given to the above alternatives, and the fact that they have been established as reasonable alternatives, we believe you should consider the alternatives I have discussed. We also believe you must consider the above alternatives in view of the provisions of the California Environmental Quality Act and particularly subsection (d) of Section 15126 of the CEQA Guidelines.

We are well aware that water can be pumped uphill to the areas in which it might be used in a joint project; we believe,

however, that a gravity facility with a conveyance at a higher elevation may well accomplish the result with less energy and less cost. Certainly that alternative must be considered.

I would make one final observation. I know there is concern that a conveyance facility along the existing Canal route will encounter serious problems because of the agricultural parcels along the route. I believe that if the facility were in part to provide service to the area, you would find a cooperative attitude on the part of the landowners involved.

I thank you for the opportunity to make these comments. If you have any questions, I would be happy to answer them.